

**Amendments to the Drawings:**

The attached sheet of drawings includes new Figure 3.

Attachment: Figure 3

### **REMARKS/ARGUMENTS**

These remarks are in response to the Office Action dated July 29, 2005. Claims 1-9 and 11-20 are pending in the present application.

#### **Objections to the Drawings**

In the Office Action, the Examiner has objected to the drawings because “a display containing the plurality of tree structures comprising a hierarchical series of nodes, along with the respective input and output lists” are not shown in a drawing. Applicant respectfully submits that several examples of such tree structures are illustrated throughout the Specification. Nevertheless, Applicant has added new Figure 3, which is the tree structure (tree #2) illustrated in the Specification at page 19, lines 11-23. Tree #2 clearly illustrates that the tree structure includes an input tree and an output tree, and that each of the input and output trees includes a plurality of hierarchical nodes and a list item that is associated with a node of the tree. Because the tree structure (tree #2) has been moved from the Specification to Figure 3, Applicant respectfully submits that no new matter has been presented.

#### **Claim Rejections**

In the Office Action, the Examiner rejected claims 1, 4-6, 9, 11-15, and 18-20 under 35 U.S.C. §103(a) as being unpatentable over Mizoguchi and Vedula et al. (U.S. Patent No. 6,823,495). Claims 2, 3, and 16 were rejected under 35 U.S.C. §103(a) as being unpatentable over Mizoguchi, Vedula and MacLeod (U.S. Patent No. 6,434,545). Claim 7 was rejected under 35 U.S.C. §103(a) as being unpatentable over Mizoguchi, Vedula and Premierlani et al. (U.S. Patent No. 5,555,367). Claim 8 was rejected under 35 U.S.C. §103(a) as being unpatentable over Mizoguchi, Vedula and Lee et al. (U.S. Patent No. 6,535,883). Claim 17 was rejected under 35 U.S.C. §103(a) as being unpatentable over Mizoguchi, Vedula and MacLeod and further in view of Moshfeghi (U.S. Patent No. 6,476,883).

In rejecting the independent claims, the Examiner stated:

**Referring to claims 1 and 18-20, Mizoguchi discloses a tool for graphically defining an expression with a graphic user interface (GUI) component with means for responding to user input for generating a graphic definition of the expression by defining a plurality of tree structures (Figures 6 and 13), wherein Figure 6 discloses the creation of an initial data structure and wherein Figure 13 further depicts two distinct data structures wherein two are defined based on the use of a conditional statement. Mizoguchi discloses lists with a plurality of items that are associated with a respective node as seen on Figure 11. Figure 11 of Mizoguchi also clearly discloses an input data structure and at least one other tree structure representing an output data structure wherein any associated list item defines a formatting definition, used for the graphic expression. Mizoguchi discloses an expression generator component adapted to read the graphic definition of the expression provided by a user through the GUI component, with the expression generator analyzing the graphic definition and generating an expression based on the structure of the data structure and any list items associated with respective nodes of the data structure (Figure 23), wherein the grid representation which is the graphic definition is executed and the result of the execution is outputted, this involving analyzing and generating of an expression from the graphic representation. Mizoguchi does not clearly disclose the defining process of multiple tree structures, wherein the structure in Mizoguchi has not been clearly disclosed as containing hierarchical nodes. Vedula discloses the defining process of multiple tree structures, wherein further disclosing that these tree structures include hierarchical nodes as is seen in Figure 1. It would have been obvious for one skilled in the art, at the time of the invention to learn from Vedula to use the means of multiple tree structures with the structures containing hierarchical nodes.**

#### Independent Claims 1, and 18-20

Applicant respectfully submits that the present application claims foreign priority under 35 U.S.C. §119 to European Patent Application No. 9922920.5, filed on September 29, 1999, the entirety of which is incorporated herein by reference. Certified copies of the priority documents were filed at the time of filing of the present application. The Vedula reference was filed on September 14, 2000, after the priority filing date of the present application. Accordingly, Applicant respectfully submits that Vedula cannot be cited as a prior art reference against the present application.

Alone, Mizoguchi fails to teach or suggest generating a graphic definition of an expression by “defining a plurality of tree structures comprising a hierarchical series of nodes, and one or more lists comprising a plurality of items, each list item being associated with a respective node of an associated tree structure, wherein at least one of the tree structures represents an input data structure and at least one other tree structure represents an output data structure wherein any associated list item defines a formatting definition,” as recited in claims 1, and 18-20. Thus, Applicant respectfully submits that claims 1 and 18-20 are allowable over Mizoguchi.

Claims 4-6, 9, and 11-15 depend on claim 1, and the above arguments apply with full force. Therefore, Appellants respectfully submit that claims 4-6, 9, and 11-15 are also allowable over the cited reference.

#### Dependent Claims 2, 3, 7, 8, 16 and 17

Claims 2, 3, 7, 8, 16 and 17 depend on claim 1 and therefore, the arguments with regard to claim 1 apply with full force to claims 2, 3, 7, 8, 16 and 17. Thus, even if the secondary references disclose the features described by the Examiner, claims 2, 3, 7, 8, 16 and 17 are still allowable because Mizoguchi fails to teach or suggest the present invention as recited in claim 1. Accordingly, Appellants respectfully submit that claims 2, 3, 7, 8, 16 and 17 are allowable over the cited references.

#### Conclusion

In view of the foregoing, Applicant submits that claims 1-9 and 11-20 are allowable over the cited references. Applicant respectfully requests reconsideration and allowance of the claims as now presented.

Applicant's attorney believes that this application is in condition for allowance. Should any unresolved issues remain, Examiner is invited to call Applicant's attorney at the telephone number indicated below.

Respectfully submitted,  
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Date

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